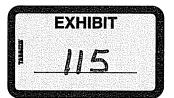
```
1
        IN THE UNITED STATES DISTRICT COURT FOR THE
2
                   NORTHERN DISTRICT OF OKLAHOMA
3
4
     W. A. DREW EDMONDSON, in his )
5
     capacity as ATTORNEY GENERAL )
     OF THE STATE OF OKLAHOMA and )
     OKLAHOMA SECRETARY OF THE
     ENVIRONMENT C. MILES TOLBERT,)
7
     in his capacity as the
     TRUSTEE FOR NATURAL RESOURCES)
     FOR THE STATE OF OKLAHOMA,
8
9
                  Plaintiff,
10
                                    )4:05-CV-00329-TCK-SAJ
     vs.
11
     TYSON FOODS, INC., et al,
12
                  Defendants.
13
                       THE VIDEOTAPED DEPOSITION OF
14
     GORDON JOHNSON, PhD, produced as a witness on
15
     behalf of the Defendants in the above styled and
16
     numbered cause, taken on the 18th day of August,
17
18
     2008, in the City of Tulsa, County of Tulsa, State
19
     of Oklahoma, before me, Lisa A. Steinmeyer, a
     Certified Shorthand Reporter, duly certified under
20
21
     and by virtue of the laws of the State of Oklahoma.
22
23
```

TULSA FREELANCE REPORTERS 918-587-2878

24 25



1	tomorrow?	
2	MR. McDANIEL: Yeah, because waiting for	
3	her to get the Record and seeing where you ran	
4	off and left me behind, but if you wouldn't mind	
5	doing it, I'd appreciate it.	06:08PM
6	MR. NANCE: I'll E-mail it to you tomorrow,	
7	and with that, I have no further questions.	
8	REDIRECT EXAMINATION	!
9	BY MR. McDANIEL:	
10	Q Just a couple of follow-ups, Dr. Johnson.	06:08PM
11	Precision in language is pretty important in science	
12	and it is also in the law. So there were a couple	
13	of words used in your answers that I need to	
14	clarify. Mr. Nance made the statement that says if	
15	poultry litter is land applied, it's inevitable that	06:08PM
16	the waste will run off. Did you hear him say waste	
17	when you answered yes?	
18	A I don't recall that he said waste, but I would	
19	agree that if there is runoff, then it's inevitable	
20	that there would be some waste in the runoff.	06:09PM
21	Q What is waste in your definition?	
22	A Well, anything that would be associated with	
23	that waste material that was applied to the land.	
24	Q So waste is phosphates; waste is nitrates;	
25	waste is potassium; waste is what?	06:09PM

TULSA FREELANCE REPORTERS 918-587-2878

```
Well, I think in the context of that question,
1
      it had to do with materials that would wash off that
2
3
      originated with the waste that was applied to the
      land.
4
             Okay. So you're saying that if you put a
                                                                       06:09PM
5
      surface fertilizer or amendment or something on the
б
 7
      surface and it rains, it's inevitable you're going
      to see some evidence of it in the runoff?
8
              Yes.
9
             All right.
10
              That's generally the -- that would generally
11
      be the case.
12
              True of commercial fertilizer?
13
      A
              Yes.
14
                                                                       06:10PM
              True of biosolids?
15
              No, it's not true of commercial fertilizer and
16
      biosolids if they're incorporated and time has
17
      passed for a reaction to take place in the soil.
18
              Okay. You're adding conditions to the
19
       question --
                                                                       06:10PM
20
21
              That's right.
              -- that I didn't put in the question.
22
23
       Α
              Okay.
              If you're just surface broadcast spreading any
24
       type of surface fertilizer or amendment and it
                                                                       06:10PM
25
```

TULSA FREELANCE REPORTERS 918-587-2878